

**Georgetown County Ambient Air Monitoring Stakeholder Group**  
**Georgetown, South Carolina**

June 27, 2008

Thomas J. Flynn, III, Manager  
Air Data Analysis and Support  
SC Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

Re: Comments on Network Description and Ambient Air Network Monitoring Plan  
Calendar Year 2009

Dear Mr. Flynn:

The Georgetown County Ambient Air Monitoring Stakeholder Group appreciates the opportunity to provide comments on DHEC's draft Network Description and Ambient Air Network Monitoring Plan, Calendar Year 2009 (the "Plan"). Our membership consists of local government and business interests in Georgetown County, South Carolina. Local government, industry and the public all depend on accurate and representative ambient air quality data to confirm 1) that public health is being protected, 2) that air quality is within state and federal limits, and 3) that Georgetown County is a place where new industry should locate and existing industry can compete successfully in a global marketplace. Ambient air quality data is a key decision point when a new government or industrial facility considers locating in Georgetown County, and when investment decisions are being made to upgrade and expand our existing facilities.

**Comments on the 2009 Plan**

1. Since the Georgetown Stakeholder Group first started meeting with DHEC in 2005, our primary message has been consistent: "Ambient air monitoring in Georgetown should be performed consistently with air monitoring in similar communities throughout South Carolina and in neighboring states." As discovered during our extensive monitor benchmarking effort in 2007, this is clearly not the case and comparison of data (as we discussed at the December 2007 stakeholder meeting) between Georgetown and similar cities is very difficult, if not impossible, as a result.
2. The Stakeholders believe the recent "near miss" in 2004-2006 with PM<sub>10</sub> non-attainment was due to the placement of the Georgetown CMS monitor too close to an unpaved section of a state roadway. This situation resulted in thousands of hours of staff time being expended (both at DHEC and Stakeholder organizations) and was completely avoidable had a policy of consistent monitor placement been adopted by the Department when the issue was first identified in the early 1990's<sup>1</sup>.
3. The Stakeholders endorse the premise that all special purpose monitors should be operated no more than a few weeks at any one location (as is the practice in neighboring states). SPM's should never be operated at the same location for more than two years. We understand that DHEC management has agreed with this principle, yet proposes

---

<sup>1</sup> Letter from Gene Slice to James A. Joy dated August 5, 1994 details siting problems with Georgetown CMS monitor, documents data quality problems, and recommends discontinuation of monitoring at this location. According to Mr. Slice (former Director of Ambient Air Monitoring at DHEC), the Department agreed with the recommendations but took no action.

continued operation of two SPM's in the Georgetown area for more than 20 years at the same locations. We do not understand this apparent contradiction.

4. We agree with the establishment of a PM<sub>10</sub> monitor at the Beck Administrative Offices and encourage DHEC to expedite its installation. We also agree that using data from this monitor as "background data" for air modeling purposes is a significant improvement over the current situation. We have concerns that other similar communities have the benefit of background monitors that are located farther from the city center and, as a result, benefit from lower background levels. We appreciate DHEC's decision to improve this situation that has become a key issue in several permitting decisions in the Georgetown area in recent months/years. We feel it is imperative to establish this new monitor as quickly as possible and begin building the required database necessary for future dispersion modeling.


Due to the severe economic impact that could result at some point in the future from data that is inconsistent that collected in other parts of South Carolina and in other states, the Georgetown Stakeholders have no other choice than to "agree to disagree" with DHEC's 2009 Network Plan, specifically comments 1 through 3 above.


We do appreciate the open dialogue that exists on this matter, as well as the opportunity to express our position during the review periods on the Annual Updates of the Network Descriptions and Ambient Air Monitoring Network Plans.

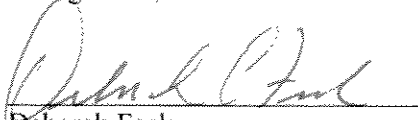
All Georgetown Stakeholders remain committed to ensuring the best air quality possible for our community. This is accomplished through 1) strict adherence to applicable state and federal air quality requirements and guidelines, including those that pertain to ambient air quality monitoring and 2) projects adopted by Georgetown Stakeholders to reduce particulates beyond levels contained in regulatory requirements.


Sincerely,

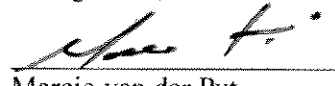
GEORGETOWN COUNTY AMBIENT AIR STAKEHOLDER GROUP

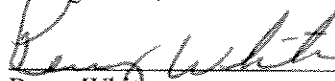
  
Steve Thomas  
Administrator, City of Georgetown  
P.O. Drawer 939  
Georgetown, SC 29442

  
David Schronce  
Director, Port of Georgetown  
PO Box 601  
Georgetown, SC 29442-0601

  
Deborah Feck  
Mill Manager  
International Paper – Georgetown Mill  
700 S. Kaminski Street  
Georgetown, SC 29440

  
Sel Hemingway  
Georgetown County Administrator  
PO Box 421270  
Georgetown, SC 29442

  
Marcio van der Put  
General Manager  
Arcelor Mittal Georgetown  
PO Box 619  
Georgetown, SC 29442

  
Perry White  
Plant Manager  
GEO Specialty Chemicals  
1330 Pier Street  
Georgetown, SC 29440

Mr. Tommy Flynn  
June 27, 2008

Page 3

Cc: Pat Walker – DHEC Envir. Services  
Robbie Brown – DHEC BAQ  
Larry Ragsdale – DHEC Region 6  
Wendy McIntyre DHEC Region 6  
Eric Evans – Arcelor Mittal Georgetown  
Gary Weinreich – IP Georgetown

Myra Reece – DHEC BAQ  
Scott Reynolds – DHEC Envir. Services  
Ron Garrett – DHEC Region 6  
Matt Maxwell – DHEC Region 6  
Michael Elmore – SC SPA  
Wayne Gregory – Georgetown County  
Economic Development Director